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Attorneys for Defendant,
SEAGATE TECHNOLOGY LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

**IN RE SEAGATE TECHNOLOGY LLC
LITIGATION**

Case No. 3:16-cv-00523-JCS

CONSOLIDATED ACTION

**JOINT STIPULATION AND [PROPOSED]
ORDER TO CONTINUE THE MARCH 15,
2019 CASE MANAGEMENT
CONFERENCE AND EXTEND THE
DEADLINE TO FILE A JOINT CASE
MANAGEMENT STATEMENT**

This Joint Stipulation is made by and between Plaintiffs and Seagate Technology LLC (“Seagate,” and together with Plaintiffs, the “Parties”), by and through their respective undersigned counsel of record, with reference to the following facts:

RECITALS

1. WHEREAS, Plaintiffs filed a renewed motion for class certification (“Motion”) on October 15, 2018 (Dkt. 189);

2. WHEREAS, the Court denied Plaintiffs' Motion on January 22, 2019 (Dkt. 200);

3. WHEREAS, the Court instructed the parties “to meet and confer regarding a plan to resolve or try Plaintiffs’ individual claims.”

4. WHEREAS the Court had ordered the parties to file a joint case management statement (“Joint CMC Statement”) no later than February 22, 2019 (*id.*);

5. WHEREAS, the Court had further ordered that a case management conference (“CMC”) be held on March 1, 2019 at 2:00 pm (*id.*);

6. WHEREAS, on February 21, 2019, pursuant to a stipulation of the Parties, the Court ordered that the CMC be continued until March 15, 2019 at 2:00 pm and the deadline for the parties to file the Joint CMC Statement be extended until March 8, 2019 (Dkt. 210);

7. WHEREAS the parties are working diligently to negotiate a potential resolution of Plaintiffs' individual claims, and therefore require additional time to prepare and submit the Joint CMC Statement and prepare for the CMC;

8. WHEREAS, the Parties have agreed, subject to the Court's approval and availability, that the CMC be continued until March 29, 2019, or the earliest available date thereafter; and

9. WHEREAS, the Parties have agreed, subject to the Court's approval, that the deadline to file the Joint CMC Statement be extended until March 22, 2019.

STIPULATION

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED BY AND
BETWEEN THE PARTIES that, subject to the Court's approval and availability:

(1) the Case Management Conference presently calendared for March 15, 2019 at 2:00 pm
be continued until March 29, 2019 at 2:00 pm; and

(2) the deadline for the parties to file a joint case management statement be extended until March 22, 2019.

Dated: March 7, 2019

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By _____
/s/ Neil A.F. Popović
NEIL A.F. POPOVIĆ

Attorneys for Defendant
SEAGATE TECHNOLOGY LLC

I, Neil A.F. Popović, whose user ID and password are used to efile this document, hereby attests that, pursuant to Local Rule 5.1(i)(3), concurrence in this filing was obtained from each of the other Signatories, in lieu of each's signature.

Dated: March 7, 2019

HAGENS BERMAN SOBOL SHAPIRO LLP

By _____
/s/
STEVE W. BERMAN

Attorneys for Plaintiffs

Dated: March 7, 2019

AXLER GOLDICH LLC

By _____
/s/
MARC A. GOLDICH (*Pro Hac Vice*)

Attorneys for Plaintiffs

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

The Honorable Joseph C., Spero
Chief Magistrate Judge